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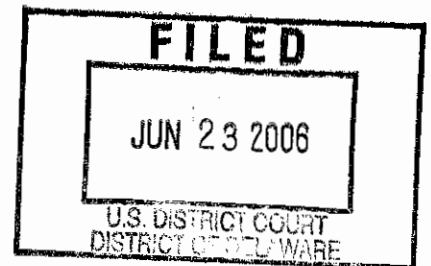
IN The United States District Court
District of Delaware

LEONARD Baylis

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Stanley Taylor et al

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• CA. # 06-11-SLR
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Plaintiffs Reply To Defendants
Argument Against
Motion For injunctive Relief

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Plaintiff Concedes that on 12 June 06
Plaintiff was transferred to mental
health unit. And this part is Satisfied.

However, other issues brought before the
Court in Motion For injunctive Relief have
not been answered.

Such AS : IN Motion For injunctive

II

Relief, at page VII - See exhibit A: "where mental health treatment... Medication be consistent with modern medical reality..."

Plaintiff is being treated for Attention Deficit Disorder, Depression and Seizure/Fugue. Plaintiff was taken off ADD medication, Ritalin and placed on Wellbutrin 1 x day. Plaintiff was taken off Ritalin because "it poses risk for seizure"
See exhibit B

The medication Wellbutrin poses more a risk for seizure than Ritalin or Adderall
See exhibit C, pg 8

And Wellbutrin must be administered twice daily to have effect on ADD
See exhibit C, pg 8. (Plaintiff receives Wellbutrin 1 x day and it is not the sustained release dosage as mentioned in exhibit * (21st June changed to twice daily))

III

There are other medications suitable for the treatment of ADD see exhibit C, pg 8. And when one changes one's medication for treatment of multi disorders, the change or removal of one medication will affect the dynamics or synergy of the total or combined affect of the other medications. See exhibit C, pg 9

Plaintiff asserts that there needs to be an evaluation / reconsideration of medications; this to observe the actual effectiveness, if any, of the half the recommended dosage of replacement medication, Wellbrotein against the reservations of the first line medications for ADD - Ritalin or Addoral see exhibit C, pg 2-6

With the benefit of extensive research it is determined by National Mental Health Experts that the best medications - if for some reason first line medications are not allowed (and, in this case, removed) -

~~IV~~ IV

IN order OF EFFECTIVENESS ARE listed AS
Follows see exhibit c pg 8. Bottom line is
that the MOST Successful medications in place
OF First line medications FOR ADD ARE MODAFINIL
OR PROVIGIL see exhibit c pg 8. However
this medication is NOT CONSIDERED because OF
Cost.

Plaintiff, because he still experiences episodes
OF psychic distress AND CONFUSION, ASSERTS
that current treatment is NOT Appropriate
AND that there is INSUFFICIENT medical
STAFF to Administer the proper Monitoring
AND time FOR effective mental health

~~THE~~

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treatment, Counseling And Actual Therapy to
defeat Eighth Amendment claim alleging deliberate
indifference - See Ramos v Lamm Supra 639

Fzd 575. Mere volume of treatment is
not sufficient as well - 42 U.S.C.A § 1983
Const. Amend 8

Plaintiff prays to get treatment enough
so that he may better understand and deal
with his illness where perception becomes
fractured and works against his intelligence.
For example, his periodic inability to think
in chronological order; for periods of

~~III~~ VI

Confusion And psychic distress in Response to Stimulus that is Normal to others; to better Understand, And deal With, With medication And therapy (proper medication And therapy) the total of his illness And diminish the occurrence of Self destructive behaviors And the likelihood of being another Number on the prison Count. in the Future.

Important to this issue is that the Dept. of Corrections did not Act on this until brought before the Court - See exhibit D.

Also, the State's Answer asserts that

VII

"Plaintiff Failed to participate in the 'Greentree' Program." They (Defendants) do not note that Plaintiff was actually classified to the 'Life Skills Program'. See exhibit E.

Surely it was errant to move Plaintiff with noted disturbances, abruptly, from a Mental Health Unit at Gaudet Hill Prison to an inmate run, highly confrontational and highly suspect (incidences of abuse in the program) area such as the "Greentree" program. Especially when Plaintiff was classified to 'life skills', a classroom program.

VIII

Plaintiff asserts that, due to Dept of Correction's delay in moving him to the Mental Health unit and not taking protective measures when aware of possible harm, after grievances and letters were submitted; after several incidences occurred in view of Correctional Officers, and plaintiff being exposed to violence and threats of violence, anxiety, chest pains - absolute hades, some days . . . Plaintiff asserts that such is likely to be repeated if plaintiff is placed back in general population — and that psychic

~~VII~~
IX

Distress will further culminate if Plaintiff is not given proper medications —
Be properly and timely evaluated as to how these medications are working and proper mental health treatment (therapy which is not constrained by medical understaffing and meets current mental health realities and rulings e.g. (see) *Tillery v Owens*, 719 F Supp at 1303.

Plaintiff asserts that absent injunctive relief (psychological) deterioration will be likely, self improvement unlikely

~~XXXX~~
X

And Needless Suffering Will Continue.

Respectfully Submitted

To June 06 Paul Bsh

Leonard Baylis 100231

Delaware Correctional Center

June 06 19977

Certificate of Service

I, Leonard Baylis, hereby certify that I have served a true
and correct cop(ies) of the attached: Answer to Argument
Injunctive Relief upon the following
parties/person (s):

TO: Eileen Kelley
Dept of Justice
820 N. French St
Wilmington De 19801

TO: _____

TO: _____

TO: _____

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, 1181 Paddock Road, Smyrna, DE 19977.

On this 21st day of June, 2006

Leonard Baylis

UM Edward Baylis
SBI# 100231 UNIT 23-D-L-3

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977



Office of Clerk

United States District Court
District of Delaware

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Delivered
June 21, 2006